

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of the Joint Application of )  
)  
**Tello, LLC** )  
Transferor )  
) WC Docket No. \_\_\_\_\_  
and )  
)  
**Tello Communication, LLC** )  
Transferee )  
)  
For Grant of Authority Pursuant to )  
Section 214 of the Communications Act of 1934, )  
as amended, and Sections 63.04 and 63.24 of the )  
Commission’s Rules to Complete a )  
Transfer of Control of an Authorized )  
Domestic and International Section 214 Carrier )

**STREAMLINED APPLICATION FOR AUTHORITY TO ASSIGN DOMESTIC AND  
INTERNATIONAL BLANKET SECTION 214 AUTHORITY**

Tello, LLC (“Tello” or “Transferor”) and Tello Communication, LLC (“Tello Communication” or “Transferee,” and together with Transferor, the “Applicants”), pursuant to Section 214 of the Communications Act of 1934,<sup>1</sup> as amended, and Sections 63.04 and 63.24 of the Commission’s Rules,<sup>2</sup> respectfully request authority to complete a transaction (“the Transaction”) whereby Tello Communication will acquire ownership and control of Tello, LLC from its parent company, Miron Enterprises, LLC (“Miron”). Applicants further request that a new international 214 authorization be granted to Tello as part of this application process.

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<sup>1</sup> 47 U.S.C. § 214.

<sup>2</sup> 47 C.F.R. §§ 63.04, 63.24.

Although the Transaction will result in a change in the ultimate ownership of Tello, no assignment of licenses, assets, or customers will occur as a consequence of the proposed transaction. Tello will continue to provide service to its existing customers under the same rates, terms, and conditions. Accordingly, the Transaction will be transparent to customers of Tello. As explained herein, this application qualifies for streamlined processing pursuant to Sections 63.03 and 63.12<sup>3</sup> of the Commission's Rules.

#### **I. Request for Streamlined Processing**

The Applicants respectfully request streamlined treatment of this Application pursuant to Sections 63.03 and 63.12 of the Commission's Rules, 47 C.F.R. §§ 63.03 and 63.12. With respect to domestic authority, this Application is eligible for streamlined processing pursuant Section 63.03(b)(2)(i) because, immediately following the transactions, (1) Applicants will hold less than a ten percent (10%) share of the interstate, interexchange market; (2) Applicants will not provide local exchange service; and (3) neither of the Applicants is dominant with respect to any service.

With respect to international authority, this Application is eligible for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's Rules, 47 C.F.R. § 63.12(a)-(b). In particular, Section 63.12(c)(1) is inapplicable because neither of the Applicants is a foreign carrier, or is affiliated with any foreign carrier, and none of the scenarios outlined in Section 63.12(c) of the Commission's Rules 47 C.F.R. § 63.12(c), applies.

In support of this Application, Applicants provide the following information:

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<sup>3</sup> 47 C.F.R. §§ 63.03, 63.12.

## **II. Description of the Applicants:**

### **A. Tello, LLC**

Tello, LLC is a Georgia limited liability company with principal business offices located at 4780 Ashford Dunwoody Rd., Suite A236, Atlanta, Georgia, 30338. Tello provides prepaid wireless telecommunications service in all 50 states, and the District of Columbia. Tello's services include domestic and international calling, text messaging and wireless data (Internet access). Tello also sells handsets (phones).

### **Tello Communication, LLC**

Tello Communication, LLC is a Georgia limited liability company with its principal business offices located at 4780 Ashford Dunwoody Rd., Suite A236, Atlanta, GA 30338. Tello Communication is a holding company.

## **III. Description of the Transaction**

By this Application, Tello Communication seeks approval to acquire ownership and control of Tello, LLC from its parent company, Miron Enterprises, LLC. Tello currently provides international communications services pursuant to its parent, Miron's, international 214 authority. Applicants request that a new international 214 authorization be granted to Tello as part of this application process.

Following the proposed transaction, Tello's customers will remain customers of Tello and will continue to receive services under the same rates, terms and conditions. As a result, the Transaction will be virtually transparent to Tello's customers. The only change resulting from the Transaction will be that Tello will be a direct, wholly owned subsidiary of Tello Communication, LLC, which is well qualified to control the continuing operations of Tello, LLC.

**IV. Public Interest Statement**

The proposed Transaction will serve the public interest by enabling Tello to expand its operations and compete more effectively in the telecommunications marketplace.

Given the increasingly competitive nature of the telecommunications market, Applicants are seeking to complete the proposed Transaction as soon as possible to ensure that customers can obtain rapidly the benefits of the proposed Transaction. Accordingly, Applicants respectfully request that the Commission process, consider and approve this Application as expeditiously as possible.

**V. Information Required by Section 63.24(e)**

In accordance with the requirements of Section 63.24(e) of the Commission’s Rules, the Applicants submit the following information:

**63.18(a) Name, address and telephone number of each applicant:**

**Transferor:**

Tello, LLC  
4780 Ashford Dunwoody Rd.  
Suite A236  
Atlanta, Georgia 30338  
Telephone: (678) 528-0398  
Facsimilie: (360) 485-1389

**Transferee:**

Tello Communication, LLC  
4780 Ashford Dunwoody Rd  
Suite A236  
Atlanta, GA 30338  
Telephone: (678) 640-1650  
Facsimilie: (360) 485-1389

**63.18(b) Government, state or territory under the laws of which each corporate or partnership applicant is organized:**

Tello, LLC and Tello Communication, LLC are Georgia limited liability companies.

**63.18(c) Answer to Question 10. Name, title, post office address, and telephone number of the officer or contact person to whom correspondence concerning the application is to be addressed:**

**Transferor:**

Florin Miron  
Tello, LLC  
4780 Ashford Dunwoody Rd.  
Suite A236  
Atlanta, Georgia 30338  
Telephone: (678) 528-0398  
Facsimilie: (360) 485-1389  
Email: [florin.miron@keepcalling.com](mailto:florin.miron@keepcalling.com)

**With a copy to Counsel:**

Jonathan S. Marashlian  
Jacqueline R. Hankins  
Marashlian & Donahue, PLLC  
1420 Spring Hill Road, Suite 401  
Tysons, Virginia 22102  
Telephone: 703-714-1313  
Facsimile: 703-563-6222  
E-Mail: [jsm@CommLawGroup.com](mailto:jsm@CommLawGroup.com)

**Transferee:**

Abdul Tawab Molvi  
Tello Communication, LLC  
4780 Ashford Dunwoody Rd.  
Suite A236  
Atlanta, Georgia 30338  
Telephone: (678) 640-1650

**With a copy to Counsel:**

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E-Mail: [jsm@CommLawGroup.com](mailto:jsm@CommLawGroup.com)

**63.18(d) Answer to Question 10. Section 214 Authorizations**

Transferor: Miron Enterprises holds blanket domestic Section 214 authority and holds international Section 214 authority granted in File No. 214-20060816-00394 for provision of global or limited global resale service. Tello, LLC operates pursuant to Miron's international Section 214 authority. As part of this application process, Tello requests that the Commission grant a new international Section 214 authorization directly to Tello.

Transferee: Tello Communication, LLC does not hold any Section 214 authority.

**63.18(h) Answer to Question 11: Name, address, citizenship and principal business of any person or entity that directly owns at least ten (10) percent of the equity of the applicant, and the percentage of equity owned by each of those entities:**

**Pre-Transaction Ownership of Tello, LLC**

The following entities and persons hold a 10% or greater direct ownership interest in Tello, LLC:

Miron Enterprises, LLC  
4780 Ashford Dunwoody Rd  
Suite A 236  
Atlanta, GA 30338  
Percentage of Equity Interest Held: 100%

Miron Enterprises, LLC has the following ownership:

Florin Miron  
Str. Alexandru Xenopol, NR 13, Apt 5  
Sibiu, 550159 Romania  
Percentage of Equity Interest Held: 92.5%

Abdul Tawab Molvi  
5458 Trowbridge Dr  
Atlanta, GA 30338  
Percentage of Equity Interest Held: 2.5%

Silvana Tatu  
5 Suru Street  
Sibiu, 550317 Romania  
Percentage of Equity Interest Held: 2.5%

Daniel Faur  
Calea Cisnadiiei 15, SC. A, AP M2  
Sibiu, 550376 Romania  
Percentage of Equity Interest Held: 2.5%

**Pre- and Post-Transaction Ownership of Tello Communication, LLC**

Tello Communication is 100% owned by Abdul Tawab Molvi, a U.S. citizen.

**63.18(h) Answer to Question 12**

Applicants do not have any interlocking directorates with a foreign carrier.

**Answer to Question 13**

See Section III above.

**63.18(i) Answer to Question 14**

Applicants certify that they are not foreign carriers, nor are they affiliated with foreign carriers, nor will they become affiliated with foreign carriers as a result of the proposed Transaction.

**63.18(j) Answer to Question 15**

Applicants certify that they do not seek to provide international telecommunications services to any destination country where:

- (1) An Applicant is a foreign carrier in that country; or
- (2) An Applicant controls a foreign carrier in that country; or
- (3) Any entity that owns more than 25 percent of Applicants or that controls Applicants controls a foreign carrier in that country; or
- (4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate more than 25 percent of Applicants, and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of international basic telecommunications services in the United States.

**63.18(k)** Not Applicable.

**63.18(l)** Not Applicable.

**63.18(m)** Not Applicable.

**63.18(n)** Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.

**63.18(o)** Applicants certify that they are not subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998. See 21 U.S.C. § 853a. *See also* 47 C.F.R. § § 1.2001-1.2003.

**63.18(p) Answer to Question 20**

Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to Section 63.12(a)-(b) of the Commission's Rules, 47 C.F.R. § 63.12(a)-(b). In particular, Section 63.12(c)(1) is inapplicable because none of the Applicants is a foreign carrier, or is affiliated with any foreign carrier, and none of the scenarios outlined in Section 63.12(c) of the Commission's Rules 47 C.F.R. § 63.12(c), applies.

**VI. Information Required by Section 63.04**

In lieu of an attachment, pursuant to 47 C.F.R. § 63.04(b), Applicants submit the following information in support of their request for domestic Section 214 authority in order to address the requirements set forth in 47 C.F.R. § 63.04(a)(6)-(12):

**63.04(a)(6)** A description of the Proposed Transaction is set forth in Section III above.

**63.04(a)(7)** Tello provides prepaid wireless telecommunications service in all 50 states, and the District of Columbia. Tello's services include domestic and international calling, text messaging and wireless data (Internet access). Tello also sells handsets (phones). All of the services provided by Tello are competitive in nature and the Company does not hold a dominant position in any market.

Tello Communication is a holding company. Tello Communication does not provide domestic or international telecommunications services.

**63.04(a)(8)** The Applicants respectfully request streamlined treatment of this Application pursuant to Sections 63.03 of the Commission's Rules, 47 C.F.R. §§ 63.03 and 63.12. This Application is eligible for streamlined processing pursuant Section 63.03(b)(2)(i) because, immediately following the transactions, (1) Applicants will hold less than a ten percent (10%) share of the interstate, interexchange market; (2) Applicants will not provide local exchange service; and (3) none of the Applicants is dominant with respect to any service.

**63.04(a)(9)** By this Application, Applicants seek authority with respect to both international and domestic Section 214 authorizations (this Application is being separately and concurrently filed with respect to both type of authorities in compliance with Commission Rule 63.04(b), 47 C.F.R. § 63.04(b)).

**63.04(a)(10)** Prompt completion of the proposed Transaction is critical to ensure that Applicants can obtain the benefits described in the forgoing Application. Accordingly,

Applicants respectfully request that the Commission approve this Application expeditiously in order to allow Applicants the proposed Transaction as soon as possible.

**63.04(a)(11)** Not applicable.

**63.04(a)(12)** A statement showing how grant of the Application will serve the public interest, convenience, and necessity is provided in Section IV above.

## **VII. Conclusion**

For the reasons stated above, Applicants respectfully submit that the public interest, convenience and necessity would be furthered by a grant of this Application. Applicants therefore respectfully request that the Commission consider and approve this Application expeditiously to permit Applicants to consummate the proposed transaction as soon as possible.

Respectfully submitted,



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*Counsel for Tello, LLC and Tello  
Communication, LLC*

Filed: July 14, 2017

### **Certification**

I, Florin Miron hereby certify under penalty of perjury that I am the CEO of Tello, LLC (“Tello”); that I am authorized to make this certification on behalf of Tello; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to Tello are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30 day of June, 2017

Florin Miron  
Florin Miron (Jul 3, 2017)

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Florin Miron  
CEO/ President  
Tello, LLC

### **Certification**

I, Abdul Tawab Molvi hereby certify under penalty of perjury that I am the Director of Tello Communication, LLC (“Tello Communication”); that I am authorized to make this certification on behalf of Tello Communication; that the foregoing filing was prepared under my direction and supervision; and that the contents with respect to Tello Communication are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30 day of June, 2017

A.T. Molvi  
A.T. Molvi (Jul 3, 2017)

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Abdul Tawab Molvi  
Director  
Tello Communication, LLC